![IT&E logo](Life in Motion)

Telecommunications Relay Service
Application for Renewal of current Certification
Island of Saipan

Submitted to:
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, DC 20554

Submitted by:
Micronesian Telecommunications Corporation
d/b/a Pacific Telecom, Inc. (PTI)
P.O. Box 500306
Saipan, MP 96950

Provider of Service:
Hamilton Telephone Company
d/b/a Hamilton Telecommunications
1001 Twelfth Street
Aurora, NE 68818
402-694-3656 TTY/Voice
800-618-4781 Toll Free
402-694-5037 FAX

September 24, 2012

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

In reference to Public Notice released July 23, 2012, the Micronesian Telecommunications Corporation d/b/a IT & E, on behalf of the Island of Saipan respectfully submits the attached application for renewal of the Saipan Telecommunications Relay Service. The Island of Saipan is meeting all FCC minimum requirements and all of the required information is included in this filing.

If any further information or clarification is needed we will be pleased to promptly provide the same.

Sincerely,

Rose S. Soledad
Managing Director
Micronesian Telecommunications Corp.

TELECOMMUNICATIONS RELAY SERVICE
APPLICATION FOR RENEWAL OF CURRENT STATE CERTIFICATION

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Introduction

This is an application on behalf of the Island of Saipan submitted by the Micronesian Telecommunications Corporation to have the Saipan Telecommunications Relay Service be certified as a Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission. The Island of Saipan has been certified for the certification time period beginning July 26, 2008 and ending July 25, 2013.

Official notices, documentation and correspondence related to this application should be directed to:

Leriza S. Debrum
Micronesian Telecommunications Corporation (d/b/a the PTI)
P.O. Box 500306
Saipan, MP 96950
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Libby Carpenter
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P.O. Box 306
Saipan, MP 96950
E-mail: libby.carpenter@itehq.net

Operational questions about the center may also be directed to the following:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1001 12th Street
Aurora, NE 68818
Voice/TTY: 402-694-3656
Toll Free: 800-618-4781
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

Request for Renewal of Current State Certification

Wherefore, the Micronesian Telecommunications Corporation requests that the Federal Communications Commission certify the Island of Saipan Telecommunications Relay Service provided through Hamilton Telephone Company in Aurora, Nebraska.

The Micronesian Telecommunications Corporation
on behalf of the Island of Saipan

By:_____

Leriza S. Debrum
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TRS Contract Status

Hamilton Telephone Company d/b/a Hamilton Telecommunications is operating the Saipan Telecommunications Relay Service under contract with the Micronesia Telecommunications Relay Corporation. The term of the contract is effective October 1, 2004 through September 30, 2012 with additional one-year extensions.

Hamilton provides TRS service for the island of Saipan from the Georgia Center located at 2231-T Dawson Road, Albany, GA 31707.

The Saipan Telecommunications Relay Service provides users with a complete service package including all features and services as detailed in this filing. Training for Communication Assistants is continual. Saipan Telecommunications Relay Service has also developed an outreach program for the Island of Saipan with a team of staff people devoted to this function.

§ 64.604 Mandatory minimum standards.

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) Operational standards –

> *(1) Communications assistant (CA).*

>> *(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.*

>> *(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.*

>> *(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.*

Recognizing that high quality Relay Communications Assistants ("CAs") are critical to providing consumer satisfaction, Saipan Telecommunications Relay Service thoroughly trains its Relay CAs to meet the specialized communications needs of individuals who are deaf, hard of hearing or have difficulty speaking. All Saipan Telecommunications Relay Service CAs possess clear and articulate voice communications. They have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with the various cultures of relay users, languages and etiquette. All Saipan Telecommunications Relay Service CAs provide a typing speed of a minimum of 60 words per minute, and Hamilton confirms this by giving oral-to-type tests of CA speed.

CAs are trained to relay calls in a manner that meets and often exceeds FCC standards. The following describes how Saipan Telecommunications Relay Service's service provider trains its CAs to meet operational proficiency standards stated above. Before hiring, exams are given to each applicant in the following areas to ensure that the candidate has the needed skills to become a fully trained Relay CA:

(1) Spelling skills (must achieve at least 90% correct)
(2) Reading skills (must be able to read clearly and distinctly)
(3) Typing proficiency

Additional details about these requirements are as follows:

Spelling Skills
The minimum spelling skill required of Saipan Telecommunications Relay Service Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. CAs must pass a spelling exam to be eligible to work as a Saipan Telecommunications Relay Service CA and score in at least the 90th percentile. The spelling skills exam is based on a 12th grade spelling level. Saipan Telecommunications Relay Service performs similar testing for Spanish CAs.

English Reading, Speaking, and Writing Skills
Communication Assistants must meet all grammar proficiency requirements including reading, speaking, and writing English Communication at a minimum of a 12th grade level prior to employment. Saipan Telecommunications Relay Service also tests for diction, clear and articulate voice communications and a neutral accent by requiring each prospective CA to complete a reading exam.

Typing Proficiency
Communication Assistants must type 60 words per minute (wpm) for five minutes. Saipan Telecommunications Relay Service exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm. Saipan Telecommunications Relay Service's provider has an average typing speed of 68.9 wpm with 98% accuracy.

Newly hired CA are required to meet the Saipan Telecommunications Relay Service minimum typing proficiency standard on an oral-to-text exam within a three week period before they may take calls. Saipan Telecommunications Relay Service also tests its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If a CA is unable to meet the 60 wpm requirement, the CA is removed from live relay calls until further training and compliance can be accomplished.

Saipan Telecommunications Relay Service also uses a computer based typing program for continuing enhancement of keyboarding, spelling and grammar skills. This program is available to all CAs.

Saipan Telecommunications Relay Service performs test calls to document current proficiency levels of the CAs and to make sure each is making progress over the term of their employment. Conducting typing tests during live relay calls also ensures that Relay CAs are meeting all typing requirements during actual calls.

Training
All Saipan Telecommunications Relay Service staff, including management, receive 20 hours of initial training devoted solely to disability issues including ASL "gloss", ASL style and grammar, tone of voice, deaf, hard of hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This training is

done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs are well trained to effectively meet the specialized needs of relay users.

In addition to basic training during new hire training, Saipan Telecommunications Relay Service provides an additional 12 hours of specialized/cultural training annually.

Spanish language relay CAs must complete the same training as all traditional Relay CAs and must additionally pass tests confirming proficiency in the Spanish language.

Proficiency Examinations
Saipan Telecommunications Relay Service CAs begin relaying calls at the end of the three-week training period, assuming all examinations have been passed and proficiency skills have been shown. In addition to these exams and skill tests, CAs must successfully complete several relay call scenarios to demonstrate proficiency in simulated scenarios. Hamilton can then determine that a CA is meeting and exceeding all minimum FCC proficiency requirements. Tests are kept confidential and portions of the tests are changed routinely. CAs are tested on a variety of topics monthly to ensure that they continue to meet all requirements.

CA Performance Monitoring to Ensure Each CA Continues to Meet All Requirements
Through its provider's advanced relay platform, Saipan Telecommunications Relay Service has established a unique remote call monitoring system. Saipan Telecommunications Relay Service uses this call monitoring system to continually monitor call performance. Such items as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated daily.

Saipan Telecommunications Relay Service constantly monitors its CAs for quality control. Two formal call evaluations are completed each month, and informal "spot checking" is conducted every day to ensure that CAs are performing properly on calls.

Formal call monitoring includes observation of the call from start to finish. The CA either earns a passing or failing score in the applicable category. These monitorings are conducted by a Relay Supervisor and the Monitoring Supervisor. Two formal evaluations are required of each CA per month.

Through the call monitoring process, any CA not in compliance with quality standards is taken off duty for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

> *(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.*

Saipan Telecommunications Relay Service does not change Communication Assistants during a call. Even at the end of shifts, over lunch hours, and other breaks, Saipan Telecommunications Relay Service CAs stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.

Saipan Telecommunications Relay Service exceeds the FCC standard for substitution of CAs for TTY-based TRS and STS TRS.

Saipan Telecommunications Relay Service only substitutes a CA if the following should occur:

- **A caller requests a change in gender of the CA**
  Saipan Telecommunications Relay Service CAs, when requested, will switch a call to another CA who is of the same gender as the caller and retain that CA for the user throughout the relay call.
- **Verbal abuse or obscenity is directed to the CA**
  If a relay user becomes abusive towards a CA (calling names, etc.) or does not give a number to dial, Saipan Telecommunications Relay Service's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the CA is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.
- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists or,**
- **A major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation.

If a call does need to be transferred, another CA replaces the CA relaying the call at the same workstation so that the relay user's call is not interrupted (except to identify the new CA to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

> *(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.*

Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. Saipan's provider has the technical capability to automatically route calls to CAs of the preferred gender, if available, based on customer profile selection.

> *(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Saipan Telecommunications Relay Service transmits conversations between Relay and voice callers in real time.

> *(2) Confidentiality and conversation content.*

> > *(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.*

> > *(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

Saipan Telecommunications Relay Service CAs are instructed not to disclose the content of any relayed conversation regardless of content, and to refrain from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. CAs are instructed not to intentionally alter a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs are instructed to relay all conversation verbatim unless the relay user specifically requests summarization or if the user requests interpretation of a call. Saipan Telecommunications Relay Service employs various methods to ensure that all relay users' confidentiality is maintained, including the restriction of access to its call centers and the partitioning of CAs into individual cubicles to ensure relay call privacy. All Saipan Telecommunications Relay Service employees must sign a confidentiality agreement committing to keep all information confidential.

All information about users is treated confidentially and will not be sold, distributed, shared, or divulged by Hamilton or any of its employees, unless divulging such information is compelled by lawful order.

(3) Types of calls.

(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

Saipan Telecommunications Relay Service does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Saipan Telecommunications Relay Service will continue to manage its traffic loads in a manner that will not require that customers be asked to call back later.

Saipan Telecommunications Relay Service is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Saipan Telecommunications Relay Service is also able to process credit cards, any Saipan local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Saipan Telecommunications Relay Service's CAs when they want to use an alternate form of billing. The CA selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice actually bills the call (based on conversation time) as described previously, for intralata, interlata and international calls. Saipan Telecommunications Relay Service bills no calls and receives no revenue.

Coin Sent Paid
Saipan Telecommunications Relay Service is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. The technology and networks between the common carrier network, payphones and relay do not allow for signaling to be passed so that a Communication Assistant can determine when coins have been dropped into the payphone. Furthermore, the FCC ordered that coin sent paid calls are not feasible.

Saipan Telecommunications Relay Service does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

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Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice will then rate and bills any long distance payphone calls. Once billing has been established the call will be processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

Cellular/Wireless/PCS Phone Access
Saipan Telecommunications Relay Service is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call.

Workstations have built-in DTMF generating capabilities to perform dialing or access functions for relay users. The DTMF software sends tones that activate automated voice systems and pagers. With DTMF capability, Saipan Telecommunications Relay Service can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

The relay switch identifies wireless calls with a false ANI associated with it and Saipan Telecommunications Relay Service processes the call as "no bill" preventing the relay user from having to use alternate form of billing. One exception is when false ANI information is forwarded. Although infrequent, this situation would require the CA to ask for an alternate form of billing.

Directory Assistance
Saipan Telecommunications Relay Service gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

End User Billing for Directory Assistance
The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. With intralata presubscription, all billing is performed by the customer's carrier. All directory assistance calls are sent to the customer's carrier of choice for processing and billing. Saipan Telecommunications Relay Service does not set any rates for long distance or operator assisted calls since the customer's carrier of choice bills these calls. All directory assistance calls are billed via the customer's long distance carrier.

Network Access

Saipan Telecommunications Relay Service's system provides for and serves all of the following types of calls.

(1) Local calls originating and terminating within Saipan, including EAS and optional calling plan calls

(2) Intralata, interstate calls which are considered local calls – Billed to the TRS Interstate Fund

(3) Intralata calls originating and terminating within Saipan

(4) Interstate calls that originate within Saipan and terminate outside of Saipan - Billed to the TRS Interstate Fund

(5) Interstate calls that originate outside of Saipan and terminate in Saipan - Billed to the TRS Interstate Fund

(6) Interstate calls that originate outside of Saipan and terminate outside of Saipan - Billed to the TRS Interstate Fund

Saipan Telecommunications Relay Service 800 numbers, including 711, will be able to place the call types listed above. Saipan Telecommunications Relay Service's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform stores the necessary information about extended area service and optional calling plan arrangements in Saipan so that calls made within an EAS area or optional calling area are not billed to the customer. ANI information appears at the workstation automatically and the terminating number is keyed in by the Communication Assistant so that a billing record can be created. For calls originating in areas where ANI information is not forwarded, Saipan Telecommunications Relay Service's Communication Assistants will key in originating number information.

Local and Intrastate Relay Calling

Saipan Telecommunications Relay Service provides local and intrastate calling to the users of Saipan Telecommunications Relay Service and has obtained the necessary information (NPA/NXX) to build a database to identify the difference between local and intrastate calls (this includes expanded local information).

Saipan Telecommunications Relay Service's provider has contacted the LECs within Saipan to collect all EAS and local optional calling plan information. Once this information was gathered, Saipan Telecommunications Relay Service's provider updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans

will not be billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. Saipan Telecommunications Relay Service's relay database determines if it is a local or intrastate toll call and gives the Communication Assistant notification if billing information is required. If it is a local call, no billing arrangements are necessary and there are no charges. If it is a toll call, Saipan Telecommunications Relay Service sends the call to the customer's carrier of choice for billing purposes.

The entire call process and CA procedures are designed to make the relay center seem invisible. To the relay user, a call looks like it was placed from his or her primary location to the call destination. Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier, as described further in this Section.

Access to Regionally Directed Toll-Free Numbers
Saipan Telecommunications Relay Service allows access to regionally directed toll-free numbers. Because Saipan Telecommunications Relay Service passes true Caller ID information, the caller's ANI reflects a Saipan number which results in the call being routed to the correct state or regional location.

Access to Restricted Toll Free Numbers
The service provided by Saipan Telecommunications Relay Service allows access to restricted 800 numbers and other special prefixes. Saipan Telecommunications Relay Service is providing this service today through an incumbent LEC via re-originating dial tone. Saipan Telecommunications Relay Service makes sure that all of the relay users in Saipan have access to all 800 numbers and other special prefixes.

Access to Businesses with Special Prefixes
Saipan Telecommunications Relay Service understands that some local telephone companies have abbreviated numbers available for services calls. Saipan Telecommunications Relay Service will continue to work with LECs to ensure proper routing and will allow Saipan Telecommunications Relay Service users to access businesses with special prefixes.

Extended Area Service
Saipan Telecommunications Relay Service's provider has obtained the needed local calling area information from the Saipan LECs and routinely updates this information. This includes any EAS and/or local optional calling plan data. This data is collected through letters, telephone calls, and meetings with the LECs in Saipan.

Saipan Telecommunications Relay Service's provider also makes use of the Terminating Point Master (TPM) from Telcordia to verify Latas, as well as vertical and horizontal positions, which are necessary elements in determining mileage and jurisdictions. Saipan

Telecommunications Relay Service's provider uses the TPM to define call jurisdictions by linking the calling and called numbers to geographic data tables that contain NPA-NXX information, identifying intralata, interlata, or local/EAS. The jurisdiction is also defined at the workstation during the actual call. Saipan Telecommunications Relay Service's provider updates the TPM file monthly.

Interstate and International Calls

Saipan Telecommunications Relay Service provides interstate and international calling to Saipan Telecommunications Relay Service users. Interlata (including interstate and international) and intralata long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interlata and intralata long distance calls. On each interlata and intralata call, Saipan Telecommunications Relay Service forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

When a call has been defined as a long distance call, Saipan Telecommunications Relay Service sends this call to its relay switching tandem. The customer's selected carrier code is sent with each call so that the tandem sends the call to the customer's carrier of choice. Each call is identified as a relay call. If a relay user has signed up with his/her carrier of choice for a "relay" discount or the carrier is required to give a relay discount, the carrier will bill the call as a relay call and apply any discounts. Saipan Telecommunications Relay Service users will receive one bill from their carrier of choice just like they do for all of their direct calls. Saipan Telecommunications Relay Service explains this type of billing arrangement through all Outreach and Customer Service activities, in newsletters, relay materials, etc. so that relay users understand how to select a carrier and find the best long distance rates.

The section below (under the heading End User Billing for all Toll Calls) contains a description of how end users are billed for toll calls.

Inbound International Calls

Saipan Telecommunications Relay Service provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Saipan Telecommunications Relay Service then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

End User Billing for all Toll Calls

Interlata (including interstate and international) and intralata and intrastate long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate and intrastate long distance calls. On each interlata and intralata call, Relay New Mexico forwards the appropriate information digits, calling number and called

number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Saipan Telecommunications Relay Service forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record will contain: the originating and terminating numbers and the call type (e.g., person-to person, collect). Interlata and intralata billing records will be created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The long distance carrier bills are based on conversation time using their own rounding calculations. Saipan Telecommunications Relay Service does not pass on session time to the carrier so only conversation time is billed by the carrier. Billing and collection is then the responsibility of the interexchange carrier who carries the call.

Saipan Telecommunications Relay Service's provider has the unique advantage in the industry of being a relay provider which is not an IXC. The customer's carrier of choice actually bills the call (based on conversation time) for intralata, interlata, and international calls. This means that the timing of the call for billing purposes begins immediately upon pickup at the called number. If a caller requests a person-to-person toll call, the timing begins only after the requested person has answered the call. If a relay user has signed up with his/her carrier of choice for a "relay" discount or the carrier is required to give a relay discount, the carrier will bill the call as a relay call and apply any discounts. Saipan Telecommunications Relay Service bills no calls and receives no revenue. All billing is performed by the carrier.

The format of the bill for all toll calls will be determined by the carrier as Relay Saipan does not bill any relay calls. However, the call digit information will identify the call as a TRS call and will further designate the type of call (i.e. 3rd number calls, direct dial call, collect call and person-to-person call). This will allow carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Saipan Telecommunications Relay Service has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

Automated Billing System to Determine Call Jurisdiction

Saipan Telecommunications Relay Service's provider makes use of an automated billing system to determine call jurisdiction. Saipan Telecommunications Relay Service's provider marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Saipan Telecommunications Relay Service's provider performs a second check of call jurisdiction during the monthly settlement process. By determining the jurisdiction of every relay call twice, Saipan Telecommunications Relay Service's provider can guarantee that call jurisdictions are established correctly and that Saipan Telecommunications Relay Service will only pay for intrastate relay minutes. In addition to redundant jurisdiction look-ups, Saipan Telecommunications Relay Service's provider also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly.

(iv) Relay services shall be capable of handling pay-per-call calls.

Pay-Per-Call Services
Saipan Telecommunications Relay Service allows relay users to access intrastate and interstate 800 or 900 pay-per-call services in which the company providing the service bills the end-user directly. Saipan Telecommunications Relay Service has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

Saipan Telecommunications Relay Service's provider bills the Interstate TRS Fund and the Micronesia Telecommunications Corporation using the percentage split defined by the Interstate TRS Fund Administrator for 800 and 900 calls. Customers may choose to block 900 calls from being made altogether via forms provided by Saipan Telecommunications Relay Service.

> *(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.*

TTY/ASCII to Voice
Saipan Telecommunications Relay Service is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Call Processing
Saipan Telecommunications Relay Service is able to accept a call from a hearing and voice capable caller, place a call to a text based caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Carryover (VCO)
Saipan Telecommunications Relay Service allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Saipan Telecommunications Relay Service.

Two-Line VCO
Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Reverse Two-Line VCO
Hamilton's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

VCO-TTY and TTY-VCO
Saipan Telecommunications Relay Service provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

VCO-VCO
Saipan Telecommunications Relay Service provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

Hearing Carryover (HCO)
Saipan Telecommunications Relay Service allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Saipan Telecommunications Relay Service.

Two-Line HCO
To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

HCO-TTY and TTY-HCO
Saipan Telecommunications Relay Service provides his feature allowing HCO users to contact TTY users (or vice versa) via the relay.

HCO-HCO
This service allows two HCO users to contact each other through the relay. Saipan Telecommunications Relay Service provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

> *(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.*

TTY to TTY (Call Release)
Saipan Telecommunications Relay Service processes TTY to TTY calls when it is necessary to go through a voice switchboard first or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Saipan Telecommunications Relay Service gives the calling party the option to communicate independent of the relay function.

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Saipan Telecommunications Relay Service provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e., the relay user's carrier of choice).

Voice to Voice Call Release
Saipan Telecommunications Relay Service provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call has been released from the workstation, the call ceases to be a TRS call and is not subject to the per-minute charge to the State.

Speed Dialing
Relay users may choose up to 50 numbers they would like programmed for speed dial. When a Relay user makes a call to a number on their speed dial list, they first connect to the CA and just tell the CA, "pls call Mom". Speed dialing is available through the Saipan Telecommunications Relay Service customer profile.

Three-Way Calling
Saipan Telecommunications Relay Service provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

> *(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.*

Machine Recording Capabilities
Saipan Telecommunications Relay Service's recording function allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained only for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system.

When Saipan Telecommunications Relay Service has to redial to an answering machine, voice mail, interactive voice messaging unit or any other type of recording system, for whatever reason, Saipan Telecommunications Relay Service does so without billing the customer for any subsequent long distance relay calls.

> *(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

Answering Machine and Voice Mail Retrieval
Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.

2. If the user requests message retrieval, Saipan Telecommunications Relay Service obtains the appropriate access codes from the user. Saipan Telecommunications Relay Service does not retain access codes or any other information needed to access a voice mail system subsequent to the call. This information is considered "call" information and just like any other call information, is kept confidential.

3. After the voice processing system has been accessed, Saipan Telecommunications Relay Service Communication Assistants begin to relay any messages that have been recorded or leave a message as requested. Saipan Telecommunications Relay Service makes use of its advanced recording function to capture this information as discussed previously.

4. If the Communication Assistants must call again to finish relaying any messages, Saipan Telecommunications Relay Service Communication Assistants do so without billing the end user for subsequent calls.

Saipan Telecommunications Relay Service alerts relay users to the presence of a recorded message and/or interactive menu. Saipan Telecommunications Relay Service uses hot keys (automatic macros) to announce recordings or interactive messages. Saipan Telecommunications Relay Service does not charge a relay user for subsequent calls to a recording or to interactive message.

Answering Machine Retrieval (Single-Line)
Saipan Telecommunications Relay Service provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. Saipan Telecommunications Relay Service records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Procedure for Handling TRS Emergency Calls

Saipan Telecommunications Relay Service's provider uses a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Saipan Telecommunications Relay Service uses Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.

- In the event that a caller does not have the access number to 911 and the emergency appears to be of a nature that time will not permit the caller to hang up and call directly to 911, the CA will contact the Emergency Call Relay Center (ECRXC) which is accomplished through one stroke on the keyboard.

- Simultaneously, the CA obtains the address from which the person is calling from and selects the "emergency call" box option on the software at the workstation. (A Supervisor assists every 911 call. When a Communication Assistant makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)

- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)

- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.

- Saipan Telecommunications Relay Service passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

Back-up Emergency Procedures

As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Saipan Telecommunications Relay Service's provider has procedures in place to access its own emergency database:

- The software used by Saipan Telecommunications Relay Service takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of locations in Saipan stored in the database. Saipan Telecommunications Relay Service has mapped each NPA/NXX in Saipan to the appropriate PSAP. Once this search is complete (it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Communication

Assistant can immediately dial the appropriate emergency personnel. This process ensures that Saipan Telecommunications Relay Service users have access to the correct and appropriate PSAP.

- Saipan Telecommunications Relay Service passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

- If the caller is using a cellular or wireless phone, the ANI is not a good indication of where the caller is actually positioned. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.

- Saipan Telecommunications Relay Service's emergency database application described above meets the current requirements established by the FCC.

FCC Rules for Emergency Calls
In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." Saipan Telecommunications Relay Service's database automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Saipan Telecommunications Relay Service accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP:

1) through the use of Intrado's 9-1-1 infrastructure and

2) through the PSAP database maintained by Saipan 's provider.

TTY to TTY Communications Between PSAP and Caller
Saipan Telecommunications Relay Service will process direct TTY to TTY communications between the PSAP and the TTY caller.

If a Caller Disconnects Before Being Connected to the PSAP
In the event that a caller disconnects before being connected to the PSAP even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Saipan Telecommunications Relay Service can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

During the course of emergency 911 calls, the CA continually solicits as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from. This meets the FCC's current requirement where a CA must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

The emergency call plan used by Saipan Telecommunications Relay Service follows this section. This covers the scenario of a relay user disconnecting before the call is completed. If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

911 Procedures if the caller disconnects before the emergency call to the PSAP is completed:

Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:
1. **Greeting**: This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
2. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "3". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "3". If they know how to use the TTY proceed to item "5".
3. Give the 911 dispatch operator the Voice relay number for the correct state.
4. Ask the 911 dispatch operator if they know how to use the relay.
   • Relay Explanation
     The person you are calling through relay will be typing their conversation and the CA will read it to you.
5. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Through its outreach programs and outreach materials, Saipan Telecommunications Relay Service educates relay users about how to use 911 services. As a part of this

information, Saipan Telecommunications Relay Service encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly in the event of an emergency.

In addition, Saipan Telecommunications Relay Service gives presentations to 911 centers routinely as part of its outreach program. Saipan Telecommunications Relay Service provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

> *(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

Speech to Speech
STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Saipan Telecommunications Relay Service's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC.

Saipan Telecommunications Relay Service provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Saipan Telecommunications Relay Service has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA. The CA repeats the name and states the number of the person to call. The Speed Dial feature is of great benefit to STS users.

Saipan Telecommunications Relay Service complies with the 15-minute requirement prior to changing STS CAs. A Supervisor must approve and facilitate a STS CA change. Saipan Telecommunications Relay Service exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# ____continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Saipan Telecommunications Relay Service places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

§ 64.604 Mandatory minimum standards.

(b) Technical standards –

(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Saipan Relay is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by Saipan Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly.

(2) Speed of answer.

(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Saipan Relay is committed to complying with the speed of answer requirements applicable to relay. Saipan Relay answers eighty-five percent (85%) of calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.

Saipan's Relay provider begins measuring Average Answer time from the moment a Relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment used by Saipan's Relay provider accepts the call, call detail records start to capture answer time data. Saipan Relay's timing is very accurate as no rounding takes place since this time is measured in seconds. The information reported is taken from Call Detail Records ensuring the accuracy of the data. Each call detail record tracks the amount of time a call waits to be answered. Saipan Relay's CAs do not answer a call until they are ready to engage the call. Calls in queue or calls receiving the intercept message are not counted as answered. This "queue time" field will be analyzed and reported, but not billed. Abandoned calls are included in the speed of answer calculation.

Saipan Relay has the ability to monitor speed of answer on a real-time basis via a monitoring system that is accessible to management and supervisors. This information is utilized to make CA staffing changes throughout the day. Average Answer time is displayed on the supervisor console. The Supervisor workstation and reader boards in the center indicate if calls are in queue waiting to be answered. The Supervisors are responsible for making sure that when that alert comes up that all available CA resources are logged in to the system and answering calls. Each of these tracking mechanisms allows Saipan Relay to respond quickly by adding more CAs immediately.

Daily activity reports used for internal management purposes also track answer performance information for future scheduling. In addition, Saipan Relay uses a variety of other scheduling techniques to ensure that staffing meets traffic demands. Saipan's Relay provider makes use of historical data, trending, call patterns and combines that with the knowledge of current events (e.g. football games, weather, Mother's Day, etc.) to anticipate staffing needs.

Saipan Relay has outstanding answer performance. Average answer seconds for the past year were 0.9 with 98% of calls answered in ten seconds or less.

Saipan Relay also meets all FCC call blockage standards. Saipan Relay's relay service is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Saipan Relay defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal. Currently, Saipan Relay has never come close to blocking 1 call in 100.

The systems used by Saipan Relay's are designed to prevent blockage. The switches used are high-speed, stand-alone, non-blocking digital switching matrixes. The system is fully redundant to ensure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure Saipan Relay has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by Saipan Relay - from the point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages.

Saipan Relay measures, records and reports its answer performance and blockage rate information to the Micronesian Telecommunications Corporation and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

The transmission circuits used by Saipan's provider meet or exceed industry interexchange performance standards for circuit loss and noise.

> *(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.*

Equal Access (Carrier of Choice)
Saipan Relay provides relay users with access to the interexchange carrier of their choice through TRS, and to all other operator services, to the same extent that such access is provided to voice users. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each interlata and intralata call, Saipan Relay forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. Saipan Relay's provider has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive Saipan Relay traffic. Saipan Relay offers equal access to all carriers who choose to participate.

Saipan Relay provides relay users with access to all other Operator Services to the same extent as that provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by Saipan Relay is based on the relay users' ANI that provides automatic connection to the carrier of choice for both interlata and intralata calls made by the relay user. Relay users complete a customer profile with their carrier information and Saipan Relay adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the CA of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the CA is able to do so.

Saipan Relay offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay.

In order to obtain new carriers on its platform, Saipan Relay contacts all carriers that are requested by Saipan relay users to see if they will participate in relay equal access. Saipan's Relay provider then works through ordering and testing phases with that carrier to ensure that the carrier becomes available to Saipan relay users. Saipan's Relay provider maintains a list of participating long distance carriers and makes this information available to relay users.

> *(4) TRS facilities.*
>
> > *(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.*

Saipan Relay provides telecommunications relay service 24 hours a day, 7 days a week. .

> > *(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.*

The facility used by Saipan Relay has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Saipan Relay is operated from a center located in Albany, Georgia. Saipan Relay calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the Saipan relay provider. This ensures continuous operation of the Saipan Relay.

The switches and relay platforms used by Saipan Relay's provider's are located in the Louisiana and the Nebraska relay centers. Workstation equipment, database information, and CA are located in all relay centers. Workstations in the Maryland and Massachusetts centers are controlled by the main processing and switch unit located in Nebraska via digital telecommunications facilities which are redundant T -1 circuits. Workstations in the Saipan Center are controlled by the main processing and switch unit located in Louisiana via digital telecommunications facilities which are redundant T -1 circuits. All incoming relay calls enter the relay provider's network. Calls can then be connected to workstations in any of the Relay provider's facilities. This all happens instantaneously with no call delays. Calls made to the terminating party exit through the call network as well. Saipan Relay users receive outstanding call processing and superior answer performance as a result of this network configuration.

Uninterruptible Power
All relay centers operated by Saipan's Relay provider make use of an uninterruptible power source with full battery backup to operate each center at full capacity for extended periods of time. In addition, battery back-up systems have the capability to automatically connect to a generator at each of its existing relay centers. The combination of battery and generator back-up allows Saipan Relay's provider to provide relay service for days and weeks at a time during power outages.

The power system supports the switch system and its peripherals, switch room environmentals (air conditioning/heating, fire suppression system, emergency lights & system alarms), CA consoles/terminals, CA work-site and lighting and Call Detail Record recording at each center. Employees are given procedures to follow in the event of emergency.

Saipan's Relay provider provides auxiliary power sources for nine central offices in addition to all its relay centers and has significant experience at purchasing, installing, testing and insuring that such back-up equipment is in place. All of Hamilton's back-up power systems have redundancy features functionally equivalent to the equipment in normal central offices including uninterruptible power for emergency use.

Switching System
Saipan Relay provider's second generation relay platform makes use of an Excel telecommunications switch. Its switch is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The switch supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The switch adapts to all standard network and line interfaces, including Tl, El, 11, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records.

The ISOS is a fully operational basic switch and has great flexibility. Saipan's Relay provider took advantage of this flexibility and has customized many relay functions in the ISOS operating system.

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing. The switching systems contain a fully redundant central processing unit on hot standby with automatic failover. This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. Saipan's Relay provider maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The on-sight switching system spare equipment includes:

• D4 channel bank
• All required channel bank cards
• T1 CSU packs

- Switch T -1 card
- Switch conference card

If one of the switching systems cannot be returned to service by transferring control to redundant equipment, the calls automatically will overflow to another switching system. The switching systems are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, is used to control and monitor each of the switching systems. The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online. Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to ensure the required levels of service are always met.

Saipan's Relay provider has made changes to its relay platform in recent years, making use of leading edge technology. It has upgraded its switching servers to new hardware that evolved its switching operating system from 32 bit UNIX to 64 bit Linux for more robust hardware support; and tested and deployed new switching control code which allows additional ad hoc reporting capabilities for comprehensive traffic analysis and enhanced failover and recovery. Saipan's Relay provider has also replaced database servers with new hardware and replaced legacy profile database servers with SQL servers for improved redundancy and database management. Finally Saipan's Relay provider has completed a multi-year upgrade of all production workstations to newer, standardized hardware; upgraded workstation operating systems from 16 bit to 32 bit which provides a higher level of stability; and rolled out several new workstation versions to support a variety of new features.

> *(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.*

Upgrades in Technology/Process in Determining of Technology is Reliable
Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Saipan Relay is ideal for today's rapidly changing technologically advanced environment. Saipan Relay's provider takes advantage of innovations and technological improvements to enhance the state of Saipan's relay service.

Signaling System Seven (SS7)
The relay platform used by Saipan Relay has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Saipan Relay provides true

Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

> *(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.*

True Caller ID
Through the use of SS7 signaling Saipan Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. Saipan Relay provides this information on all call types and on all carriers. Saipan Relay brings true functional equivalence to Caller ID relay users.

Saipan Relay receives and passes calling line identification information, including blocking information from all users calling through the relay service.

§ 64.604 Mandatory minimum standards.
c) Functional standards —

> *(1) Consumer complaint logs.*
>
>> *(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.*

Saipan Telecommunications Relay Service tracks all TRS complaints and all other customer service activity. Saipan Telecommunications Relay Service maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the Island until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. **All information is kept on file and available to the Micronesian Telecommunications Corporation and FCC.** Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

The Micronesian Telecommunications Corporation's complaint log consists of the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation

- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breech
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access

> *(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.*

Saipan Telecommunications Relay Service's provider reports complaint activity to the Micronesian Telecommunications Corporation on a monthly basis. The Micronesian Telecommunications Corporation submits the necessary information to the FCC as required in § 64.601 Mandatory Minimum Standards on an annual basis. The Micronesian Telecommunications Corporation has submitted copies of its 2008 through 2012 complaint logs to the FCC. The provider for Saipan Telecommunications Relay Service issues each complaint a Record ID number to enable the Micronesian Telecommunications Corporation and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainants.

> *(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a*

certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

> *(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;*

> *(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and*

> *(iii) The physical address to which correspondence should be sent.*

The Micronesian Telecommunications Corporation submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the Island office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to which correspondence should be sent. Following are the names of the contacts at the Micronesian Telecommunications Corporation for those purposes:

Leriza S. Debrum
Micronesian Telecommunications Corporation (d/b/a the PTI)
P.O. Box 500306
Saipan, MP 96950
Phone: 670-682-2612 E-mail: leriza.debrum@itehq.net
Libby Carpenter
Micronesian Telecommunications Corporation (d/b/a the PTI)
P.O. Box 306
Saipan, MP 96950
E-mail: libby.carpenter@itehq.net

The Hamilton Telephone Company d/b/a Hamilton Telecommunications, the provider of Saipan Telecommunications Relay Service, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission includes the name and address of the Island office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, and physical address to which correspondence should be sent. Following is the name of the contact at The Hamilton Telephone Company for those purposes:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1006 12th Street
Aurora, NE 68818
Voice/TTY 402-694-3656
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Community Outreach, Public Relations and Educational Programs
Saipan Telecommunications Relay Service provides community and business outreach and promotes a public awareness campaign to educate all Saipan citizens about the relay service. These efforts educate and heighten public awareness of 7-1-1 and TRS throughout Saipan through marketing, advertising and community involvement. In compliance with FCC requirements, which call for outreach to all telephone users, Saipan Telecommunications Relay Service's outreach initiatives focus on the need to educate the hearing community. As it has been in the past, the primary outreach concern is the number of hearing people who hang up on relay calls. Through participation in promotional events, presentations, workshops and instructional seminars, Saipan Telecommunications Relay Service reaches out to all relay user communities and always adjusts its programs to meet the specific needs of every audience.

Saipan Telecommunications Relay Service's outreach and awareness efforts specifically target individuals who are deaf, hard of hearing, late deafened, deaf-blind or have difficulty speaking, as well as their family, friends and caregivers. Saipan Telecommunications Relay Service performs a variety of activities to inform the public about relay and regularly participates in activities held by Saipan organizations that serve relay users.

The outreach team offers informative presentations on the features of relay services to organizations, relay user groups, businesses, educators and students, health care providers, 9-1-1 call centers, emergency, fire and law enforcement personnel, libraries, senior centers, and public and private entities. Saipan Telecommunications Relay Service's Island-wide outreach and awareness efforts include:

- Presentations
- Exhibits
- 911 Education
- Strategies for reaching Hard to Reach Relay Users
    - Hard of Hearing and Elderly Strategies
    - Speech to Speech
    - Deaf Blind
- Outreach to Businesses and Educational Institutions
- Outreach to Spanish
- Equipment Distribution Programs

- Involvement of Deaf and Island Agencies
- Customized Outreach materials
- Promotional Materials
- Variety of Brochures
- Description of Complaint Procedures in Printed Materials
- Bill Inserts and Directory Pages
- Newsletters
- TRS Web site
- Social Media
- Press Release and Public Relations
- Print Advertising
- Media Advertising

Please refer to Attachment B for sample outreach materials and a list of the outreach activities Saipan Telecommunications Relay Service has accomplished.

> *(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.*

Saipan Telecommunications Relay Service's provider performs no billing. All billing is performed by the relay users' carrier of choice for both intralata and interlata toll calls. Thus the relay users' carrier of choice bills all intralata and interlata toll calls at their applicable discounted rate for relay users. Saipan Telecommunications Relay Service's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

> *(5) Jurisdictional separation of costs —*
> > *(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.*

Saipan Telecommunications Relay Service's provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated from the Saipan Telecommunications Relay Service Fund.

> > *(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall,*

through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

Please refer to Tab 7, Method of Funding for a complete description of the Island of Saipan's funding mechanism.

(6) Complaints —
(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.606 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

The Micronesian Telecommunications Corporation will resolve all intrastate complaints within 180 days after the complaint is first filed with the Island, regardless of whether the complaint is filed with the Island relay administrator, the relay provider or with any other Island entity.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:
(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.606.

The Micronesian Telecommunications Corporation understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section

within 180 days.

The Micronesian Telecommunications Corporation understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal complaints —

(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints.

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

The Micronesian Telecommunications Corporation will assist as necessary in this process.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service.

(1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of

any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

The Micronesian Telecommunications Corporation will assist as necessary in this process.

Supplemental Information:
Intrastate Saipan Telecommunications Relay Service complaints are processed in the following manner for the Micronesian Telecommunications Corporation by its TRS provider:

Trained personnel answer all Saipan Telecommunications Relay Customer Service calls. Saipan Telecommunications Relay Service provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers with Saipan TRS inquiries and complaints. Customers may also contact Saipan Telecommunications Relay Service via e-mail and through the Saipan Telecommunications

Relay Service web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. Saipan Telecommunications Relay Service processes any complaints, which originate via e-mail, fax, telephone, regular mail, outreach events, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is Saipan Telecommunications Relay Service Customer Service department. The National Customer Service Manager, Center Manager and Vice President of Relay Service for Hamilton also view all complaint information.

In the event of a complaint regarding the Saipan Telecommunications Relay Service, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate coaching, re-training and counseling steps will be taken by the primary Supervisor to resolve the situation. Saipan Telecommunications Relay Service's detailed call records show each key command (not actual text) the CA makes. Saipan Telecommunications Relay Service can easily investigate Saipan Telecommunications Relay Service CA complaints and take disciplinary action when needed.

- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the National Customer Service Manager to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to the Micronesian Telecommunications Corporation when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem. Saipan Telecommunications Relay Service describes the above procedures and FCC complaint processes, including contact information for both Micronesian Telecommunications Corporation and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by Saipan Telecommunications Relay Service or with any action taken, Saipan Telecommunications Relay Service's monthly report to Micronesian Telecommunications Corporation will so state. The user then has the opportunity and is given written notice of that opportunity by Saipan Telecommunications Relay Service to have the complaint and action of Saipan Telecommunications Relay Service reviewed by the Micronesian Telecommunications Corporation for such action as it may deem appropriate in accordance with its rules and regulation. The Micronesian Telecommunications Corporation will act on such complaint no later than 180 days from the filing of the complaint.

The Micronesian Telecommunications Corporation will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the Island of Saipan. The Micronesian Telecommunications Corporation will cooperate in the investigation or resolution of any and all complaints concerning the Saipan Telecommunications Relay Service with the Federal Communication's Commission.

> *(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

The contract between the Micronesian Telecommunications Corporation and The Hamilton Telephone company d/b/a Hamilton Telecommunications provide for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton will provide the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Saipan Telecommunications Relay Service user to his/her called party. Hamilton has not and will never make any relay information available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.

§ 64.606 Internet-based TRS provider and TRS program certification.

(a) Documentation —

(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

The Island of Saipan is currently certified to provide intrastate TRS through July 26, 2013. This application is submitted to re-certify the Island of Saipan for an additional five years.

(b)

(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

Please refer to the Operational Standards, Technical Standards and Functional Standards sections of this application for a description of how the Island of Saipan meets or exceeds all operational, technical and functional minimum standards contained in §64.604.

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

Please refer to Tab 1 for a copy of the Island of Saipan rules and regulations governing telecommunications relay service. The Micronesia Telecommunications Corporation regulates the provision of telecommunications service in the Island of Saipan and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies. The contract entered into between the Micronesia Telecommunications Corporation and Hamilton Telephone Company provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which the Micronesia Telecommunications Corporation could terminate the agreement with Hamilton and seek such other remedies as may be available

by law. Consumers also have the opportunity, pursuant to the established rules of the Micronesia Telecommunications Corporation, to file complaints or petitions concerning the Saipan Telecommunications Relay Service requesting modifications in the provision of this service or otherwise resolving issues or concerns of the public.

> *(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes [that its program in no way conflicts with federal law].*

As demonstrated in the following section, where the Saipan Telecommunications Relay Service program exceeds the mandatory minimum standards contained in §64.604, Saipan Telecommunications Relay Service establishes that its program in no way conflicts with federal law.

Saipan Telecommunications Relay Service does exceed some of the mandatory minimum standards contained in Section 64.604 in terms of the following items:

CA Training and Procedures
Saipan Telecommunications Relay Service not only meets, but also exceeds FCC Communication Assistant standards in the areas of hiring and training practices, typing speed to accuracy and in-call replacement of CAs.

Ability to TYPE at 60 wpm
Saipan Telecommunications Relay Service Communication Assistants must TYPE 60 words per minute. **Saipan Telecommunications Relay Service exceeds this service level by requiring CAs to maintain a high accuracy level in addition to 60-wpm typing.**

Turbo Code
Saipan Telecommunications Relay Service exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. Saipan Telecommunications Relay Service provides Turbo Code, a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. Saipan Telecommunications Relay Service users are able to automatically connect "Turbo Code" on every relay call type. With Turbo Code, Saipan Telecommunications Relay Service users can use their Turbo Code Interrupt feature.

Intrastate Spanish
In addition to Interstate Spanish to Spanish, Saipan Telecommunications Relay Service provides Intrastate Spanish to Spanish, Spanish to English and English to Spanish call handling to the relay users of Saipan and processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, Saipan Telecommunications Relay Service requires Spanish CAs pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls.

SS7 Signaling
The relay platform used by Saipan Telecommunications Relay Service has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Saipan Telecommunications Relay Service provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

(c)

> *(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.*

The Island of Saipan is currently certified to provide intrastate TRS. The Island of Saipan is requesting certification beginning July 26, 2013, continuing for a five-year period.

d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

Please refer to **Tab 7 Method of Funding** for a complete description of the State of Saipan's funding mechanism.

(e)

> *(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.*

The Saipan Telecommunications Relay Service program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

(f) Notification of substantive change.

(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet Federal minimum standards after implementing the substantive change.

Saipan Telecommunications Relay Service understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application the Micronesia Telecommunications Corporation intends that the operation of the Saipan Telecommunications Relay Service will continue to be in compliance with the Federal Communication Commission rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Saipan Telecommunications Relay Service to be out of compliance, the Micronesia Telecommunications Corporation agrees to take such action as may be reasonably required to bring the Saipan Telecommunications Relay Service into compliance.

(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

Method of Funding

Standard Features

Saipan Relay provides the following features and services, which are listed in alphabetical order to ease the use in locating specific items.

Alpha–Numeric Dialing

If a relay user gives the CA an alpha-numeric number to dial (i.e. 1-800-HAMILTO), Saipan Relay CAs automatically translate and dial the appropriate 10 digit number.

Answering Machine Retrieval (Single-Line)

Saipan Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. The technology records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the caller disconnects, the recording is automatically erased.

Should Saipan Relay have to redial to an answering machine, voice mail, interactive voice messaging unit or any other type of recording system, for whatever reason, Saipan Relay does so without billing the customer for any subsequent long distance relay calls.

ASCII Split Screen

The relay platform used by Saipan Relay's provider is compatible with ASCII software that makes use of "split screens." Saipan Relay makes use of split screens for in which the CA's typing is displayed in one window and the relay user's typing is displayed in another window on the monitor of the CA workstation.

Automated Call Routing

During peak traffic periods, the switching equipment used by Saipan Relay's provider automatically routes calls to a workstation located in another of their relay centers to ensure the required levels of service are always met. If one of the switching systems is down for any reason, the calls will automatically overflow to another switching system.

Automated Number Identification (ANI)

ANI is the telephone number of the originating party. Saipan Relay utilizes ANI technology on all of its incoming relay circuits. Saipan Relay provider's switching equipment recognizes this information and presents it to the CA workstation. ANI is used to determine call jurisdiction.

Automatic Connection Mode

The Automatic Connection Mode feature provides an automatic connection to the relay at the speed of the equipment used by the caller for all callers who have used Saipan Relay's Services at least one time before. When the first time callers reach Saipan's center, the "self-learning" database is updated with the caller's originating telephone number and the speed or call type at which the user connected to the center i.e. TTY, ASCII or Voice. After the first call, the center's equipment automatically connects at the correct speed whenever it is connected to that particular telephone number.

Average Speed of Answer

Saipan Relay's provider begins measuring Average Answer Time from the moment a relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as Saipan Relay provider's equipment accepts the call from the LEC and the public switched network delivers the call to the TRS center, Saipan Relay starts its call detail record process to capture answer time data. Saipan Relay **answers** eighty-five (85%) of all relay calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold. Abandoned calls are included in this daily answer performance calculation.

Background Noises

Background noise is anything heard by the CA during a relay call which would normally be known to a hearing person. The TTY user is continually informed of what is going on throughout the call. Saipan Relay puts this type of information in parentheses.

Saipan Relay also provides tone of voice information when it has a significant impact on the content, context or intent of the relay call.

Carrier of Choice

Saipan Relay's customer profile database, based on the relay users' ANI, provides automatic connection to the carrier of choice (AT&T, Sprint, MCI, etc.) for both interlata and intralata calls made by the relay user in the same manner that voice users have access to preferred carriers.

Cellular/Wireless Access

This feature allows relay users to access relay via cellular phones. Saipan Relay's call processing for relay cellular calls ensures that relay users will not experience billing problems. Saipan Relay automatically treats all wireless telephone calls that do not allow direct billing to the ANI as a local call. This prevents the wireless telephone user from having to make alternate billing arrangements.

CA Gender ID

With this feature Saipan Relay's macros automatically identify the CA's gender with the TTY greeting.

CA Gender Preferences

Upon request, Saipan Relay's Communication Assistants will switch a call to another Communication Assistant who is of the gender requested by the caller. That gender CA is retained for the user throughout the relay call. Customers can also profile their preferred gender and their call will automatically route to their preferred CA gender, if a CA of that gender is available.

CA in-call Replacement

As a matter of practice, Saipan Relay does not change Communication Assistants during a call. This exceeds the FCC rule that requires a CA to stay with the call for a minimum of 10 minutes or 15 minutes for STS calls. Even at the end of shifts, over lunch hours and other breaks, Saipan Relay CAs stay with a call until it is completed. Saipan Relay only substitutes a CA if obscenity is directed to the CA, a perceived conflict of interest exists or another major emergency exists. A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA).

CA Typing Speed

All of Saipan Relay's Communication Assistants must type at least 60 words per minute. Saipan Relay subtracts all errors to calculate typing speed. This ensures not only fast typists but also ACCURATE typists. The average typing speed of Saipan Relay's Communication Assistants is 68.9 wpm with 98% accuracy.

Courtesy Messages

Saipan Relay supplies a courtesy message after three rings, to inform callers that they have reached Saipan Relay. This courtesy message is transmitted in TTY and voice. Saipan Relay's courtesy message follows: "You have reached the relay. Please hold for a CA." If the call has not been answered after 15 seconds, the message repeats as follows, "Please hold for a CA".

Customer Profile Database

Saipan Relay users may indicate how their calls are handled by including their calling preferences in their Customer Profile. This feature allows Saipan Relay to customize the relay service for each relay user. Once activated, the customer profile appears on the CA's screen each time the relay user calls the relay so that the CA can properly process the call according to the user's preferences.

Saipan Relay users do not have to use their preset preferences on every relay call. These preferences can be used at the discretion of the relay user on each relay call.

Customer Profile Security

Customer profiles are based on ANI or a pre-established ten digit number. This provides a very high level of security and keeps all confidentiality practices intact. The customer profile database can only be accessed internally (the database resides on site and is part of Saipan Relay's relay platform) and a password and PIN system is used to further secure the data. With this password, the relay user can request changes to the profile at any time.

Saipan Relay Customer Profile Information:

Customer Information

Profile Field	Information Purpose
Name	First & Last Name: used for identification purposes.
Address	Street Address, City, State & ZIP Information used for further contact needs (account verification, service updates, etc.) and emergency services.
E-mail Address	Information used for further contacting client.
Phone Number	Used for profile identification when placing a call, as well as follow up.
Mailing List	Allows the user to choose to be included in the State Relay or Hamilton Relay mailing lists to receive newsletters and other important information regarding Telecommunications Relay Services.

Personalized Features

Profile Field	Information Purpose
Profile Security	Password: Secret Word consisting of 4-10 letters and/or numbers. Choosing a Password ensures the Relay User is the only person who can make changes to their profile.
Multi-User Feature	PIN: Secret number 4 digits long. A PIN allows Relay user to have their own profile if more than one relay user living in their household.
Remote Profile Feature	PIN: Allows Relay user to access their customer profile when using the relay from any telephone or web-based computer, in any location.
Language Type	Allows User to select their preferred language. Options include English and Spanish.
Preferred Permanent Connection Mode	Call Handling Options: Allows Relay users to specify how they want their calls answered by the relay. Options include: TTY, VCO, HCO, ASCII, STS, Spanish, Telebraille and Voice.

Profile Field	Information Purpose
Preferred CA Gender	Allows Relay users to specify the gender of the CA that the User prefers for each call.
Long Distance Company	Carrier of Choice: Allows Relay users to select their preferred long distance provider.
Translator	When the translator option is selected, the CA will translate ASL to English and English to ASL for both the TTY user and the voice user unless given other instruction.
No Abbreviations	By choosing "No Abbreviations", the CA will type word for word, without using abbreviations.
Slow Type Buffer	Hamilton's slow type buffer will allow the CA to type at a normal pace while sending the text to the relay user at rates of text in increments of 5 words per minute. Hamilton CAs have the ability to turn this feature on or off on a per call basis.
Spell Check Turned Off	By turning spell check off, the Relay user will see mistakes or misspelled words. Spell check is turned on automatically.
Speed Dialing	Relay users may choose up to 50 numbers they would like programmed for speed dial. When a Relay user makes a call to a number on their speed dial list, they first connect to the CA and just tell the CA, "pls call Mom".
Customizable Greetings	Allows Relay users to customize how the CAs identify relay to the person they are calling; for example, using their first name in the greeting. The profile also allows the relay user to choose to have the CA never explain relay or never identify the relay to any person called.
Restrictions	Allows the Relay user to select the types of calls to be blocked from their telephone including: long distance, 900, International, Directory assistance, toll-free and Operator assistance calls.
Background Noise	Allows the Relay user to choose whether or not to receive background noise information during their call.
Tone of Voice	Allows the Relay user to choose whether or not to receive voice descriptions.
Long Hold Times	When this feature is selected, the CA will continue to stay on hold but will not ask the Relay user repeatedly if they would like to continue the call.

Profile Field	Information Purpose
User reads slowly	DBS user reads slowly so patience is required
CA speak slowly	Request that CA talk slowly to patience is required
STS Contacts	STS Relay users can add contact information and hours of availability at each location so that a hearing user can ask for the STS user by name and be automatically connected with them in their registered location
STS Messages	Allows STS Relay users to dictate messages. CAs can save the message in the user's profile for up to 2 hours so that the STS user doesn't have to repeat the information.
Abbreviate Auto Message	This allows the CA to abbreviate messages when typing recordings or IVRs, allowing the User to receive a summarized recorded message.
Retain Information	This allows the retention of information from one inbound call for subsequent calls.
Open Line/Mute Transmission of STS User	This allows the User to communicate with the CA privately without the voice user hearing the conversation.
Specific instructions to STS CA	• Before dialing, User prefers that the CA to asks: "Shall I tell the party who is calling?" • User prefers that CA confirm call handling preferences before dialing requested number • User prefers for callers to ask to call them by name rather than by telephone number.
Standard message to leave on answering machine	This allows users to identify caller by name, request call back, specify call back number, and provide the relay telephone number.
Notes	Allows the Relay user to provide CAs with additional information they would like included or known for every call.

Guide

Profile Field	Information Purpose
Guide for Understanding your Customer Profile	A guide is included to help the Relay user understand the purpose of each section or to better understand how to complete the profile to best meet their needs.

Transfer of Database Information

Saipan Relay's provider will transfer all customer profile database information to a new TRS provider at the termination of the contract. Saipan Relay's provider will transfer this data in a usable format within 60 days prior to its last day of service.

Remote/Multi-User Profile Feature

Saipan Relay's Remote/Multi-User Profile allows relay users to access their profile from any phone or web-based computer, and through any type of relay service, whether traditional relay or Internet Relay.

Saipan Relay users simply give their telephone number (or pre-established ten digit number) and PIN number to the CA, to permit the CA to view the customer's pre-selected preferences. This feature is of great benefit to customers who have more than one relay user living in the household. With Saipan Relay's Remote/Multi-User Profile, each person can establish his/her own profile. Users who travel are always able to access their profile from anywhere.

Customer Service

Saipan Relay recognizes the importance of responsive customer care and places a large focus on responding to the needs of our customers. Saipan Relay's Customer service department is very responsive to the needs of its customers and works to resolve all customer issues in a timely manner. Customer Service instructs relay users on how to place relay calls, answers questions about any changes that have been made, assists relay users with billing questions, performs equipment testing, provides a variety of referral numbers to state organizations and schedules one-on-one outreach visits for training purposes or larger outreach activities. Saipan Relay's Customer Service is available 24 hours a day to ensure customers have constant access to customer support. Saipan Relay has a separate toll-free number for Customer Service

Deaf/Blind Pacing/Slow Typing Requests/Slow Type Buffer

Saipan Relay's slow type buffer allows the CA to type at a normal pace while sending the text to the relay user at rates of text in increments of 5 words per minute. Saipan Relay CAs have the ability to turn this feature on or off on a per call basis.

Dialed Number Verification

Saipan Relay verifies the number to be dialed by voicing it back to the voice user or typing it back to the TTY user (Saipan Relay uses a hotkey to do this so there is no CA intervention). In the same hotkey, Saipan Relay notifies the relay user if they are dialing a local number or toll number. The relay user will see "Dialing Toll (ATT) XXX-XXX-XXXX". Both of these features ensure that the correct number is dialed and gives the relay user an opportunity to notify the CA if the carrier information is incorrect.

Saipan Relay's Communication Assistants verify all pertinent information, including the number to be dialed, names, proper names, account numbers and dollar amounts.

Directory Assistance

This feature gives all relay users access to directory assistance services via the relay. Saipan Relay processes directory assistance requests in the same manner as any other relay requests. Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies herself/himself and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice will bill for directory assistance calls at their tariffed rate. With presubscription, the customer's carrier performs all billing.

Emergency Assistance

Saipan Relay provides emergency assistance to all relay users. The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Hamilton accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado's 9-1-1 infrastructure and 2) through the PSAP database maintained by Hamilton.

Emergency Numbers

Saipan Relay users can add local emergency numbers to their speed dialing list on their Customer Profile. This feature can save valuable time when time is of the essence. A relay user could simply type call Fire or call 911 and the CA will automatically dial the appropriate PSAP. Saipan Relay encourages all relay users to call 911 direct.

Enhanced Modems

The modems used by Saipan Relay's provider can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. These modems support ASCII connections and have faster ASCII detection capability (3 seconds).

Error Corrections/Abbreviation Expansion

To increase typing speed and reduce conversation time, Saipan Relay utilizes an Error Correction program which automatically checks words to be transmitted against our dictionary of commonly misspelled words. If a misspelled word is found, the Spell Checking software automatically corrects the word before it is sent to the TTY users. While the software automatically corrects any typographical errors of commonly misspelled words, proper nouns are not affected.

The spelling database is continually updated with new words as needed. Saipan Relay users have seen the benefits as fewer typing errors are seen by the TTY user. This is one more way Saipan Relay continues to bring quality service to its relay customers.

Saipan Relay also offers a feature that allows CAs to use common abbreviations which are automatically expanded to the entire word in the transmitted text, which speeds up the transmission of the call.

Saipan Relay users can specifically request to not use Spell Check or to not expand abbreviations via a customer profile.

Hearing Carryover (HCO)

This feature allows people who have difficulty speaking to place and receive calls. The HCO caller hears the communication directly from their caller without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Saipan Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Saipan Relay.

HCO-HCO

This service allows two HCO users to contact each other through the relay. Saipan Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

HCO Permanent Branding

Saipan Relay provides this service through its Customer Profile. Customers can choose to be automatically connected to HCO without any CA intervention at the workstation.

HCO-TTY and TTY-HCO

This feature allows HCO users to contact TTY users (or vice versa) via the relay. The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

HCO with Privacy

Saipan Relay provides HCO with Privacy upon the customer's request which gives privacy for the standard telephone user talking with an HCO user. The CA is not able to hear the hearing person's conversation, which goes directly to the speech disabled HCO user. The CA then voices any conversation typed by the HCO user to the other party.

Inbound International

Saipan Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Saipan Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. Inbound International calls are billed to the Interstate TRS Fund.

Intercept Messages

Saipan Relay's system provides automated overflow to its other centers which in most instances eliminates the need for intercept messages. However, if the traffic cannot be rerouted for any reason such as multiple circuit failures, the callers will be notified with the appropriate type of intercept messages, which is transmitted in TTY and voice. Minutes of use attributed to accessing intercept messages are not included in the billable minutes.

Local Exchange Carrier (LEC) Calling Services

Saipan Relay's provider has made its relay service compatible with the network used by telephone companies to provide LEC calling services in a truly functionally equivalent manner. The relay user does not experience any additional costs except to the extent that a relay user is billed for enhanced services by the relay user's LEC (not the TRS provider) or that a three-way call results in two toll calls. Saipan Relay does not charge the relay user for any special calling services.

- True Caller ID (SS7)
  Saipan Relay's provide true Caller ID service through SS7 signaling where the actual information of the calling party (not the relay center number) appears on the Caller ID box. Saipan Relay provides this information on all call types and on all carriers. Saipan Relay passes, sends and receives calling line identification information, **including blocking information** from all users calling through the relay service.

- Caller ID (CID) Per Line (Global) Block/CID Per Call Block
  Calling line information is provisioned on the relay customer's line by the LEC. All forms of Caller ID Blocking (Global or per call blocking) pass through on a per call basis with no relay intervention. Because Saipan Relay's provider makes use of true SS7 technology, rather than ISDN, all forms of calling line identification information and blocking features purchased by the LEC are passed through with no relay intervention. Because Saipan Relay can pass, send and receive calling line identification information, a whole host of other features are available including:

- Call Screening (Call Rejection) (Call Block)
  Call Screening is provisioned on the relay customer's line by the LEC in order to prevent nuisance or unwanted calls. The relay user will simply program his/her phone to block all calls from his/her selected list of phone numbers. If someone calls through relay from one of these numbers on the list, the caller receives a pre-recorded announcement stating the caller is not accepting calls at this time, which the relay will type or voice to the originating caller. Calls from other numbers are not blocked.

- Call Acceptance
  Call Acceptance is provisioned on the relay customer's line by the LEC. Call Acceptance lets a relay user block all calls except those from his/her list of special phone numbers. A relay user can add, delete or change numbers on his/her list at any time. This feature is often used in order to prevent nuisance and solicitation calls. If someone calls through relay from a number not on the list, the caller receives a pre-recorded announcement stating the caller is not accepting calls at this time, which the relay will type or voice to the originating caller. Calls from numbers not on the list are blocked.

- Anonymous Call Rejection
  Anonymous Call Rejection is provisioned on the relay customer's line by the LEC in order to prevent receiving calls that are "blocked" or "private." Relay users who do not want to receive calls from parties who have blocked their Caller ID information can make use of this feature. Callers who have blocked their Caller ID information will receive a recording indicating that the called party is not accepting calls at this time which the Communication Assistant will either voice or type to the originating caller.

- Preferred Call Forwarding
  Preferred Call Forwarding is provisioned on the relay customer's line by the LEC. Relay users create a list of numbers that they wish to forward to a new telephone number. All other callers do not forward to the new telephone number. Relay users can add, delete or change numbers on their call forwarding list.

- Unique Flash
  Unique Flash is provisioned on the relay customer's line by the LEC. Relay users create a list of numbers with their own distinctive flash (ring). If someone calls through relay that is calling from a number with a distinctive flash associated with it, the called relay party will hear or see the distinctive flash. The unique flash indicates it's one of the special callers from the individual's list.

- Call Forwarding
  Preferred Call Forwarding is provisioned on the relay customer's line by the LEC. Saipan Relay users create a list of numbers that they wish to forward to a new telephone number. All other callers do not forward to the new telephone number. Saipan Relay users can add, delete or change numbers on their call forwarding list.

- Call Trace
  Because all of Saipan Relay's network is based on SS7 connectivity, customers who have purchased Call Trace through their LEC can make use of Call Trace through relay, which works without relay intervention.

- Last Call Return
  Because Saipan Relay provides true Caller ID service through SS7 signaling where the actual information of the calling party (not the relay center number) appears on the Caller ID box, the customer is able to see the telephone number of their last incoming call. To return the call, the customer simply calls relay and gives the CA the number on the Caller ID to call back. If the customer does not have Caller ID, Saipan Relay provides last call return within the duration of the same inbound call.

- Three-Way Calling
  If a three-way call is desired and three-way calling is available from the LEC and the customer has purchased this feature from his/her LEC, the customer can use the feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

- TRS Conference Calling
  In addition to three-way calling, Saipan Relay also supports conference calling. The customer requests a relayed conference call and the text based relay user gives the number to dial and any access codes required to join the conference call.

Local/Extended Area Service

The provider for Saipan Relay has obtained the necessary information (NPA/NXX) from all Saipan LECs to build a database to identify the difference between local, EAS and intrastate calls. This database notifies the CA if the call being placed is a local call (including areas of EAS). If it is a local call, no billing arrangements are necessary and the data is recorded to calculate session minutes only.

Machine Recording Capabilities

The recording function allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating

(CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. Keys on the keyboard are used to control the speed of the recording ensuring the message is transmitted accurately by the CA. This makes the recording function very easy for Communication Assistants to use.

Pagers

Saipan Relay handles relay calls that involve pagers and beepers. There is no difference in Saipan Relay's call processing for text initiated calls made through pagers.

Regionally Directed Toll-Free Numbers

Saipan Relay allows access to regionally directed toll-free numbers. Because Saipan Relay passes true Caller ID information, the caller's ANI will reflect a Saipan number which will result in the call being routed to the correct state or regional location.

Regionally Restricted Toll-Free Numbers

Saipan Relay's service allows access to restricted 800 numbers and other special prefixes.

Reverse Two-Line HCO

Two-line HCO works in the reverse when a voice user places a call to a two-line HCO user through relay. It is then called Reverse Two-line HCO.

Reverse Two-Line VCO

Two-line VCO works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

Spanish to Spanish Relay and Spanish to English Translation

Saipan Relay provides Spanish Relay services.

Saipan Relay provides Interstate Spanish to Spanish, meeting the FCC requirement. Saipan Relay's provider bills all Interstate minutes to the Interstate TRS Fund.

In addition, Saipan Relay provides Intrastate Spanish to Spanish, Spanish to English and English to Spanish call handling.

The Saipan Spanish 800 number is associated with a separate queue for Spanish 800 calls which are directed to a separate queue so that calls flow immediately to Spanish speaking CAs. If a relay user calls another 800 number, Saipan Relay has the ability to transfer the call to a Spanish speaking CA. In addition, relay users can select "Spanish" as an option on Saipan Relay's Customer Profile. This information is presented to the CAs at the workstation for proper call processing.

CAs fluent in the Spanish language are scheduled for all shifts, 24 hours a day, seven days a week.

Saipan Relay processes all the same call types on its Spanish lines as it does on its English voice and TTY lines, including TTY, VCO, HCO, ASCII, STS and 900 calls.

Speech Difficulty Indicator

HCO users can indicate in the customized greeting section of their profile that they have difficulty speaking. For example, when an HCO user places a call to a TTY user, the CA will inform the TTY user that the caller has difficulty speaking. An indicator will appear in the Notes section of the CA workstation. CAs will uniformly recognize an "s" typed by a TTY user at the beginning of a call to indicate that the caller has difficulty speaking.

Speech to Speech (STS)

Saipan Relay's STS service allows individuals who have difficulty speaking to use his/her own voice or a speech synthesizer when using the relay. Specially trained CAs process Speech to Speech calls. Saipan Relay gives STS users access to the same profile and all of the features contained within that profile which are currently available to other relay users.

Speech to Speech/Spanish

Saipan Relay's STS service is also available in Spanish. Relay user's can select "Spanish" and "STS" as on option on Saipan Relay's Customer Profile.

Speech to Speech/Voice Carry Over (VCO)

STS/VCO is designed for people who are hard of hearing or Deaf and have difficulty speaking. The relay user can make or receive phone calls through the relay through a Speech to Speech CA using his/her own voice or voice synthesizer and read everything said by the voice caller on a TTY or VCO telephone.

STS to other TRS Communication Modes

Saipan Relay also allows STS users to place calls to people who use a TTY or other TRS communication modes such as VCO, HCO or to another person who has difficulty speaking. Speech to Speech can be used a variety of ways:

- Two hearing individuals, with the CA repeating the words of the person who has difficulty speaking.
- Two individuals who have difficulty speaking with the CA repeating both persons' words.
- A VCO user and a hearing person, with the CA repeating the words of the VCO user if the hearing person does not understand the user's speech and with the CA typing what is said by the hearing person to the VCO user.
- A TTY user and a person who has difficulty speaking without a TTY, with the CA typing the words of the person who has difficulty speaking to the TTY user.
- Hearing Carry Over with the person who has difficulty speaking typing what they would like to say and the Communication Assistant voicing it to the hearing user.
- Hearing Carry Over in combination with Speech to Speech.

Three-Way Calling

In compliance with the FCC Order released on June 17, 2003, Saipan Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

Toll Discounts

Saipan Relay's Customer Service Representatives discuss carrier of choice with relay users and direct them to other telephone numbers to access more information from particular carriers. Saipan Relay maintains a list of participating long distance carriers and telephone numbers and helps the customer shop for the best toll discounts through relay that match their calling style.

Transfer Gate Capabilities

If a relay user calls 711 or the TTY relay access number and requests another service (such as STS, Spanish, etc.), Saipan Relay has the ability to transfer the call to the appropriate workstation for call processing.

TTY to TTY (Call Release)

Saipan Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Saipan Relay gives the calling party the option to communicate independently of the relay function. If the calling party agrees to do so, the CA will drop out of the call. If the call is a long distance call, the call will be billed as a normal relay call (i.e. the relay user's carrier of choice).

Saipan Relay provides a true call release function to satisfy the FCC requirement which removes the workstation from the call.

TTY to TTY (Call Release)

Saipan Relay processes TTY to TTY calls for Relay users, in which the CA remains on the line until both parties have disconnected.

Turbo Code

Saipan Relay provides Turbo Code which is a proprietary alternate protocol developed by Ultratec. This protocol is faster than Baudot (Turbo Code is similar to "real-time") and does not have the limitation of ASCII. Turbo Code also allows for "interrupt" capability while one party is still typing. The modems used by Saipan Relay auto-detect the end-user's equipment for Turbo Code. If Turbo Code is found, Saipan Relay automatically connects in "Turbo Code" to the relay user. Saipan Relay users are able to automatically connect "Turbo Code" on every relay call type.

Saipan Relay has an automatic identification of connection speed system within its relay platform. This feature provides automatic connection at the speed, including Turbo Code, of the equipment used by the caller for any caller who has used Saipan's Relay Services at least one time before. Our switch has a "self-learning" database which is updated the first time callers reach our center with their originating telephone number and the speed at which they connected to our center.

Two-Line HCO

To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Two-Line HCO/Speech to Speech

This option works the same as a 2-Line HCO call but is processed by a specially trained STS CA. The 2-Line/STS user can choose between voicing their own conversation or having the CA voice the conversation for them. If the HCO user chooses to voice his/her conversation and becomes tired or is having difficulty being understood, he/she can type his/her part of the conversation and call on the CA to "re-voice" as needed. The HCO user can switch between voice and typing at any time during the call.

Two-Line VCO

Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Voice Carryover (VCO)

Voice Carryover (VCO) provides people who can communicate with their voice but have difficulty hearing, the ability to place or receive calls. The VCO caller speaks his or her own message directly to the caller without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. Saipan Relay allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and Saipan Relay connects the call. Voice users do not hear tones during a VCO call.

Saipan Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Saipan Relay.

VCO-HCO and HCO-VCO

Saipan Relay provides this service to VCO and HCO users who call another HCO or VCO user through the relay. The VCO user voices his/her conversation directly to the HCO user. The HCO user's typing goes directly to the VCO user.

VCO Permanent Branding

Saipan Relay provides this service through its customer profile. Customers who always want to connect VCO are automatically connected to VCO without any CA intervention at the workstation.

VCO-TTY and TTY-VCO

Saipan Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

In addition, Saipan Relay provides VCO to TTY or ASCII services as well as all other combination of call types involving VCO.

VCO-VCO

This service allows two VCO users to contact each other through the relay. Saipan Relay provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

VCO with Privacy

Saipan Relay provides VCO with Privacy upon request in which the CA will not hear the caller speaking through the relay and will only type voiced responses back to the VCO user.

Voice Gender ID

Saipan Relay's CAs indicate to the TTY user the gender of the non-TTY relay user at the beginning of the call – (M) Male, (F) Female or (Child) Child. If the CA is absolutely not sure, the CA will type (?).

Saipan Relay's CAs also indicate to the TTY user when another voice person has become involved in the call. Saipan Relay identifies the gender of the new party involved in the call immediately.

Voice to Voice Call Release

Saipan Relay provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This usually happens inadvertently. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

1010 Numbers

Saipan Relay offers 1010 dialing through relay. This service is functionally equivalent to using 1010 services when not placing calls through relay.

7-1-1

All services available from Saipan Relay are accessible through 711 including Speech to Speech. Saipan Relay meets all the same general requirements set forth for all relay calls when 711 is dialed rather than an 800 number.

Pay-Per-Call Services

The relay platform used by Saipan Relay's provider allows relay users to access intrastate and interstate 800, 900 and pay-per-call services in which the company providing the service bills the end-user directly. Saipan Relay's provider has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

A relay user calls the TTY relay number and gives the 800 or 900 number to the CA. The CA places the call as usual and begins relaying the call. On all 900 numbers, Saipan Relay CAs type the dollar amount per minute associated with the call to the TTY user and asks him/her if he/she want to continue the call before charges begin. This is the point in which callers can disconnect without being charged. The calling party is billed for the call by the 900-service provider or the carrier, whichever is appropriate.

Because no 900 blocking information is automatically passed to Saipan Relay's provider from the LEC, the provider relies on customer profile data as the only resource for this information. However, if a LEC were to contact the provider with this information, that resource would be used to block 900 access.

Customers who do not want 900 calls made from their telephone line through the relay, can complete a customer profile form. The customer profile contains an option that will block 900 calls made through the relay. This prevents anyone from calling a 900 number from that particular telephone line. If someone tries to call a 900 number through the relay from a line that has a block on it, the CA will receive notification at the workstation that this call is blocked and will not be able to place the call.

How to make long distance work for you.

Step One - Determine your call patterns.
Do you call long distance often?
If yes, where do you call? In-State? Out-of-State?
What time of day do you make these calls?

Step Two – Shop around.
Call different long distance companies. Tell them your long distance calling patterns. They may have a calling plan that fits your calling patterns.

Step Three – Choose the best rate plan that fits your call patterns.
Inform long distance carrier that you are a TTY/VCO user. Many long distance companies have TTY/VCO user discounts. Also tell them that you use the relay and want the same calling plan rates for your relay calls.

Step Four – Call your relay's Customer Service Department and tell them which long distance company you prefer to use.
Also tell Customer Service about any calling plans you have with your long distance company.

Step Five – Pay attention to rate changes.
Long distance companies are competing for your business. Rates and calling plans are constantly changing. From time to time, check back with your long distance carrier, as well as others, to see if they have a better plan that can save you more money.

**NOTE: IF YOU DO NOT CALL YOUR CARRIER AND LET THEM KNOW YOU ARE THEIR CUSTOMER AND USE RELAY YOU WILL BE BILLED AT A HIGHER RATE.

Listed below are the Long Distance Companies that are currently offered through the relay and their customer service numbers: